

EXHIBIT 4

Proposed Additional Stipulations:

1. In 2008, the John D. Georges, Jr. Trust, the Eliza Blaise Georges Trust; and, the Alexandra Coleman Georges Trust (collectively, the “Trusts”) acquired Harrison’s parent entity, Noble Feldman, Inc. (“Noble Feldman”). *See* Pl.’s Exs. 3, 4, 5, 7, and 56.
2. On March 11, 2011, A-Z prepared and submitted to Harrison a credit application and credit agreement guaranteed by Barkat Ali. (Pl.’s Ex. 1).
3. Harrison assigned A-Z two customer numbers: 017501 (for Dallas) and 017502 (for Waco).
4. A-Z ordered cigarettes and other products from Harrison, which Harrison provided.
5. From March 2011 through approximately August 1, 2016, all invoices sent to A-Z for cigarettes and other products included the customer numbers 017501 (for Dallas) and 017503 (for Waco).
6. On September 1, 2014, Imperial Trading Co. L.L.C. merged with Noble Feldman, Inc.
7. In October 2014, Wayne Baquet sent a letter to Harrison customers, including A-Z, that notified Harrison customers that “The acquisition of Harrison Company in 2008 and now its official name change to Imperial – Bossier City further strengthens our ability to service your stores now and in the future.” (Pl.’s Ex. 6).
8. On November 23, 2014, Barkat Ali sent an email to Brad Albritton (brada@harrisoncompany.com) stating “I want to pay you on time and pay more & more to reduce my debt with Harrison.” (Pl.’s Ex. 9).
9. On December 22, 2014, Rodney Thomas (rthomas@harrisoncompany.com) sent an email to Barkat and Amar Ali stating: “These payments are to be mailed weekly to Imperial-Bossier City Office.” (Pl.’s Ex. 10)
10. On February 27, 2015, Brad Albritton (brada@harrisoncompany.com) emailed a spreadsheet to Amar Ali showing Harrison’s calculation of A-Z’s total weekly balances, from 12/21/2014 through 2/22/2015. (Pl.’s Ex. 11).
11. In March 2015, Brad Albritton sent emails from his brada@harrisoncompany.com account, to A-Z, over his signature block: “Director of Finance, Harrison Company, LLC.” (Pl.’s Exs. 12, 16).
12. On April 18, 2015, Brad Albritton emailed a report to Amar Ali showing Harrison’s calculation of A-Z’s total weekly balances, from 12/21/2014 through 4/12/2015. (Pl.’s Ex. 18).
13. 4/22/15 – Brad Albritton leaves Harrison.
14. During 2015 and 2016 Harrison and Imperial integrated the two companies’ accounting systems.

15. From approximately May 4, 2015 through approximately August 1, 2016 invoices sent to A-Z had two customer numbers on each of them: 017501 and 95750 (for Dallas) and 017502 and 9751 (for Waco).
16. From 2015 through March 2019 invoices and statements sent to A-Z had Imperial-Bossier on them.
17. May 2015 – March 2019 – texts between Brad Prendergast, Wayne Baquet, and Amar Ali.
18. On May 14, 2015, Rodney Thomas (rthomas@harrisoncompany.com) forwarded an email from Jane Greene (jgreene@harrisoncompany.com) to Rafiq Hirani, which stated: “Our legal name is still Harrison, but scanning checks will take anything.” (Pl.’s Ex. 19).
19. On October 30, 2015, Brad Prendergast (bradp@imperialtrading.com) sent an email to Amar and Barkat Ali showing calculations of A-Z’s total weekly balances, from 2/20/2015 through 10/30/2015. (Pl.’s Ex. 21).
20. On August 23, 2017, Rafiq Hirani (A to Z Wholesale) emailed Rhonda Landreth (RJReynolds – Price Audit Group) stating: “Our rep from Harrison will be calling you soon to discuss the matter please.” (Pl.’s Ex. 20).
21. On August 3, 2018, Amar Ali confirmed balances, as of May 31, 2018, of \$1,368,925.67 (for A-Z Dallas) and \$1,038,500.42 (for A-Z Waco), respectively. (Pl.’s Ex. 22).
22. On March 25, 2019, Sandy Zazulak (szazulak@imperialtrading.com) emailed a report to Amar Ali showing A-Z’s total weekly balances from 3/30/2018 through 3/15/2019. (Pl.’s Ex. 23).
23. Harrison employs the salesman, the warehouse manager, and the transportation director that oversaw all deliveries to A-Z in 2018 and 2019.
24. Dan Burgos, Chris McClure, and Scott Faley are all employees of Harrison Company, LLC. (Pl.’s Exs. 24-26).
25. Any truck that delivered goods to A-Z in 2018 or 2019 had on its door: “Harrison Company, LLC, Bossier City, LA, USDOT 343249.”
26. Every truck that delivered cigarettes or other goods to A-Z in 2018 and 2019 had Harrison and Imperial’s name on them. (Pl.’s Ex. 27).
27. Harrison owns or rents the trucks that delivered cigarettes or other goods to A-Z in 2018 and 2019. (Pl.’s Exs. 28 and 29).
28. Harrison owns the warehouse located at 4801 Viking Drive, Bossier City, LA 7111 (the “Bossier City Warehouse.”)
29. The cigarettes or other goods delivered to A-Z in 2018 and 2019 all came from the Bossier City Warehouse.

30. Every delivery to A-Z in 2018 and 2019 had a manifest that read “Bossier.” (Defs.’ Ex. 57).
31. Every Invoice sent to A-Z in 2018 and 2019 read “Bossier” (Defs.’ Ex. 50)
32. Every weekly statement sent to A-Z in 2018 and 2019 read “Bossier” (Defs.’ Exs. 1-41)
33. Harrison and Imperial share accounting functions and a bank account; however, the companies file separate tax returns, and invoices to, and receipts from, their respective customers are distinguished and separately credited on the General Ledger (either to Imperial or to Harrison). (Pl.’s Exs. 36-41).
34. Sales to A-Z (for example, on October 15, 2018) were credited to Harrison (not Imperial) on the General Ledger. (Pl.’s Exs. 36-41).
35. On May 31, 2018, A-Z’s outstanding balances, as reflected in Harrison’s accounting system, totaled \$2,407,426.09. (Pl.’s Exs. 42, 43, 47).
36. On May 31, 2019, A-Z’s outstanding balances, as reflected in Harrison’s accounting system, totaled \$2,575,335.73. (Pl.’s Exs. 44, 61, 47).
37. On May 29, 2020, A-Z’s outstanding balances, as reflected in Harrison’s accounting system, totaled \$2,575,335.73. (Pl.’s Exs. 45, 47).
38. From June 1, 2018 through May 31, 2019, as reflected in Harrison’s accounting system, the gross amount of (1) “Bank Charges,” (2) Credit Memos,” (3) NSF Checks, (4) “Payments,” and (5) “Sales Invoices,” with respect to A-Z’s accounts, resulted in a “net” change to A-Z’s total outstanding balances of \$167,909.64. (Pl.’s Exs. 46, 47).
39. Harrison and Imperial separately purchase good from vendors, such as Ferrara Candy. (Pl.’s Exs. 30-34).
40. Harrison and Imperial, occasionally, purchase good from each other’s respective warehouses. (Pl.’s Ex. 35).
41. Harrison is bonded to sell cigarettes in the State of Louisiana (independent of, and separate from, Imperial). (Ex. 48).
42. Harrison contracts for and pays its own utilities at the Bossier City Warehouse, including electrical. (Pl.’s Ex. 49).
43. Harrison has its own mortgage, and executed a promissory note on the Bossier City Warehouse. (Pl.’s Exs. 50-51).
44. Harrison is named as an additional insured on Imperial’s general liability insurance policy. (Pl.’s Ex. 54).